

**COMMONWEALTH OF MASSACHUSETTS**

MIDDLESEX, SS

SUPERIOR COURT DEPARTMENT  
OF THE TRIAL COURT  
CIVIL ACTION NO. 15- 00195

VIVIANE RODRIGUES, Individually and on  
Behalf of Class Members,

Plaintiff,

v.

WINGS NETWORK;  
WINGSNETWORK;  
WINGSNETWORK.COM  
WINGSNETWORKGLOBAL.COM  
TROPIKGADGET;  
SUCCESS WEALTH101, INC.;  
GRUPO INTERNACIONAL;  
SERGIO TANAKA;  
VINICUS AGUIAR;  
THAIS AGUIAR;  
GEOVANI BENTO;  
PRISCILA BENTO;  
CARLOS LUIS DA SILVEIRA BARBOSA;  
JP MORGAN CHASE BANK, N.A.;  
WELLS FARGO BANK, N.A.; and  
JOHN DOES 1-75 Who Acted as Agents for  
Wings Network,

Defendants.

**FIRST AMENDMENT TO THE  
COMPLAINT, JURY CLAIM AND  
REQUEST FOR CLASS ACTION  
CERTIFICATION**

The plaintiff amends her complaint by adding another defendant, Banco Commercial  
Portuguese, S.A., and by addition No. 2a) as follows:

21a) The defendant, Banco Commercial Portuguese, S.A., is a banking company)  
incorporated in Portugal, with its executive office located at 7 Rua do Instituto Industrial,  
Lisbon, Portugal. At all times material hereto, the defendant, Banco Commercial Portugues  
S.A., provided banking services, maintained accounts, received and handled wire transfer of  
funds for the benefit of Wings and related parties.

Also by adding "Banco Commercial Portuguese, S.A." throughout the complaint where a cause of action is pled against the banking defendants.

Respectfully submitted,

VIVIANE RODRIGUES, Individually and  
On Behalf of Class Members, Plaintiff

By her Attorney



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